THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GIZACHEW WONDIE, a single man,

Plaintiff,

VS.

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KING COUNTY, a political subdivision of the State of Washington; KING COUNTY SHERIFF'S OFFICE, an entity of King County; KATHLEEN DECKER, in her official and individual capacities; GEORGE ALVAREZ, in his official and individual capacities; and JOHN / JANE DOE OFFICERS 1-10, in their official and individual capacities,

Defendants.

NO. 2:21-CV-01623-JHC

JOINT STIPULATED MOTION TO
EXTEND CERTAIN DEADLINES

NOTE ON MOTION CALENDAR: November 22, 2022 Same Day Motion

JOINT STIPULATED MOTION

The undersigned counsel for plaintiff Gizachew Wondie and defendants King County, King County Sheriff's Office, Kathleen Decker and George Alvarez, jointly move that the Fed. R. Civ. P. 26(a)(2) expert disclosure report and discovery cut-off deadlines in this matter be extended from the current dates as follows:

JOINT STIPULATED MOTION TO EXTEND CERTAIN DEADLINES - 1 (Case No. 2:21-CV-01623-JHC)

WAKEFIELD & KIRKPATRICK, PLLC A T T O R N E Y S A T L A W 17544 MIDVALE AVENUE NORTH, SUITE 307 SHORELINE, WA 98133 (206) 629-5489 FAX (206) 629-2120

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| Event | Current Date | Extended Date |
|---|---------------------|----------------------|
| Disclosure of Expert Reports Under Fed. | 12/07/22 | 01/09/2023 |
| R. Civ. P. 26(a)(2) | | |
| Disclosure of Rebuttal Expert Reports | 01/07/2023 | 02/07/2023 |
| Discovery Cut-Off | 02/05/2023 | 03/06/2023 |

This stipulated motion only extends the deadlines for expert disclosure reports and discovery cut-off per the above table and does not change any other case schedule events.

DATED this 22nd day of November, 2022.

WAKEFIELD & KIRKPATRICK, PLLC

| By s/Scott C. Wakefield | |
|-----------------------------|---------------|
| Scott C. Wakefield | WSBA #11222 |
| Zach Parker | WSBA#53373 |
| Wakefield & Kirkpatrick, PL | LC |
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| Shoreline, WA 98133 | |
| TEL: (206) 629-5489 | |
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| swakefield@wakefieldkirkpa | trick.com |
| zparker@wakefieldkirkpatric | <u>ck.com</u> |
| Attorneys for Defendant Geo | rge Alvarez |

DATED this 22nd day of November, 2022.

CORR CRONIN, LLP

| By <u>s/Timothy Bradshaw</u> |
|---|
| Timothy Bradshaw WSBA#17983 |
| Steven W. Fogg WSBA#23528 |
| Taryn Basauri WSBA#51637 |
| Corr Cronin, LLP |
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| Attorneys for Defendant Kathleen Decker |

JOINT STIPULATED MOTION TO EXTEND CERTAIN DEADLINES - 2 (Case No. 2:21-CV-01623-JHC)

WAKEFIELD & KIRKPATRICK, PLLC A T T O R N E Y S A T L A W 17544 MIDVALE AVENUE NORTH, SUITE 307 SHORELINE, WA 98133 (206) 629-5489 FAX (206) 629-2120

DATED this 22nd day of November, 2022. 1 2 LAW OFFICE OF DAN N. FIORITO, III 3 By_ *s/Dan N. Fiorito* Dan N. Fiorito, III WSBA#34009 4 Law Offfices of Dan N. Fiorito, III 2470 Westlake Ave. N., Suite 201 5 Seattle, WA 98109 TEL: 206-299-1582 6 dan@danfiorito.com 7 Attorneys for Plaintiff Gizachew Wondie 8 DATED this 22nd day of November, 2022. 9 KING COUNTY PROSECUTING ATTORNEYS **OFFICE** 10 By_ s/John R. Zeldenrust 11 John R. Zeldenrust WSBA#19797 Karissa L. Taylor WSBA#31563 12 King County Prosecuting Attorneys Office 13 516 3rd Avenue, #W554 Seattle, WA 98104 14 TEL: 206-477-1213 john.zeldenrust@kingcounty.gov 15 Karissa.taylor@kingcounty.gov 16 Attorneys for Defendant King County, King County Sheriff's Office 17 18 **ORDER** 19 Based on the Joint Stipulated Motion to Extend Certain Deadlines in this matter, IT IS 20 HEREBY ORDERED that the deadlines for FRCP 26(a)(2) expert disclosure reports and 21 discovery cut-off are extended as follows: 22 23 **Current Date Extended Date** Disclosure of Expert Testimony Under | 12/07/22 24 01/09/2023 FRCP 26(a)(2) 25

JOINT STIPULATED MOTION TO EXTEND CERTAIN DEADLINES - 3 (Case No. 2:21-CV-01623-JHC)

| Disclosure of Rebuttal Expert Reports | 01/07/2023 | 02/07/2023 |
|--|------------|--|
| Discovery Cut-Off | 02/05/2023 | 03/06/2023 |
| | | - |
| er case schedule events remain the same. | | |

All other

DATED this 22nd day of November, 2022.

An A. Chan HON. JOHN H. CHUN UNITED STATES DISTRICT JUDGE

Presented by:

WAKEFIELD & KIRKPATRICK, PLLC

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Scott C. Wakefield

WSBA #11222

Attorneys for Defendant State Farm Fire & Casualty Company

By s/ Timothy Bradshaw

Timothy Bradshaw WSBA#17983

Steven W. Fogg WSBA#23528

Taryn Basauri WSBA#51637

Attorneys for Defendant Kathleen Decker

By ____ s/ Dan N. Fiorito

Dan N. Fiorito, III WSBA#34009 Attorneys for Plaintiff Gizachew Wondie

19 By ____s/John R. Zeldenrust

John R. Zeldenrust WSBA#19797

Karissa L. Taylor WSBA#31563

Attorneys for Defendant King County and King County

Sheriff's Office

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JOINT STIPULATED MOTION TO EXTEND CERTAIN **DEADLINES - 4** (Case No. 2:21-CV-01623-JHC)

WAKEFIELD & KIRKPATRICK, PLLC ATTORNEYS AT LAW 17544 MIDVALE AVENUE NORTH, SUITE 307 SHORELINE, WA 98133 (206) 629-5489 FAX (206) 629-2120

CERTIFICATE OF SERVICE 1 I hereby certify that on November 22, 2022, I electronically filed the following document(s): 2 JOINT STIPULATED MOTION TO EXTEND CERTAIN DEADLINES 1. 3 with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: 4 5 **Attorneys for Plaintiff:** Dan N. Fiorito, III 6 Law Office of Dan N. Fiorito, III 2470 Westlake Ave. N., Suite 201 7 Seattle, WA 98109 dan@danfiorito.com 8 9 Attorneys for Defendants King County & King County Sheriff's Office: Karissa L. Taylor 10 John R. Zeldenrust King County Prosecuting Attorney's Office 11 516 3rd Avenue, #W554 Seattle, WA 98104 12 Karissa.taylor@kingcounty.gov 13 john.zeldenrust@kingcounty.gov 14 **Attorneys for Defendant Kathleen Decker:** Timothy Bradshaw 15 Steven W. Fogg Taryn M. Basauri 16 Corr Cronin, LLP 17 1015 Second Avenue, Floor 10 Seattle, WA 98104-1001 18 tbradshaw@correronin.com sfogg@correronin.com 19 tbasauri@correronin.com 20 s/Erica Anderson 21 Erica Anderson 22 WAKEFIELD & KIRKPATRICK, PLLC 17544 Midvale Avenue No., Suite 307 23 Shoreline, WA 98133 Tel: 206-629-5489 24 Fax: 206-629-2120 eanderson@wakefieldkirkpatrick.com 25

JOINT STIPULATED MOTION TO EXTEND CERTAIN DEADLINES - 5 (Case No. 2:21-CV-01623-JHC)

WAKEFIELD & KIRKPATRICK, PLLC A T T O R N E Y S A T L A W 17544 MIDVALE AVENUE NORTH, SUITE 307 SHORELINE, WA 98133 (206) 629-5489 FAX (206) 629-2120